



U.S. Department of Justice

United States Attorney
Southern District of New York

The Jacob K. Javits Building
26 Federal Plaza, 37th Floor
New York, New York 10278

January 22, 2025

By ECF

The Honorable Richard M. Berman
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Junard Parrot, 21 Cr. 691 (RMB)*

Dear Judge Berman:

The Government respectfully requests an extension of time to respond to the defendant's motion for a reduction in sentence, filed on December 26, 2024. (ECF No. 33).

On December 27, 2024, the Court set a deadline of January 17, 2025, for the Government to respond to the defendant's motion. Because the Assistant United States Attorney who had previously worked on this defendant's case has left the United States Attorney's Office, the Office did not timely respond. The undersigned counsel for the Government was assigned to this matter today, January 22, 2025. Accordingly, the Government requests additional time to obtain and review records, to consider the Government's position on the motion, and to draft its response. The Government respectfully requests leave to file its response on or before February 12, 2025 (*i.e.*, three weeks from today).

The Court respectfully requests the
Government's response by February 5, 2025.

Respectfully submitted,

DANIELLE R. SASSOON
United States Attorney

by:

Rebecca Delfiner
Assistant United States Attorney
(212) 637-2427

SO ORDERED:

Date: 1/22/2025

Richard M. Berman, U.S.D.J.

cc: All counsel of record (via ECF)